

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO.: 1:20-CR- 00440 |
| |) | |
| Plaintiff, |) | JUDGE SOLOMON OLIVER, JR. |
| |) | |
| vs. |) | |
| |) | |
| VLADIMIR DUNAEV, |) | <u>MOTION FOR LEAVE TO FILE</u> |
| |) | <u>SENTENCING MEMORANDUM</u> |
| Defendant. |) | <u>UNDER SEAL</u> |

Now comes Defendant Vladimir Dunaev, by and through counsel, and herein requests this Honorable Court to issue an order permitting him to file his Sentencing Memorandum under seal in the within case. The Sentencing Memorandum contains sensitive and confidential information relating to Mr. Dunaev which should not be part of the public record.

The purpose of this request is to protect the privacy interests of Mr. Dunaev. It is respectfully submitted that the privacy interests of Mr. Dunaev with respect to the information contained in his Sentencing Memorandum override the public's limited interest in access to such information about him, his background, and his life.

Respectfully submitted,

/s/ Gretchen A. Holderman
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CERTIFICATE OF SERVICE

This is to certify that the foregoing was filed electronically on the 19th day of January, 2024, in accordance with the Court's Electronic Filing System. Parties may access this filing through the Court's filing system.

/s/ Gretchen A. Holderman
GRETCHEN A. HOLDERMAN (390058508)